

February 10, 2003

Certified Article Number

Via Fax and Certified Mail RRR#

7160 3901 9844 8941 7287

SENDER'S RECORD

Mr. Edwin M. Quinones, Attorney
 U.S. Environmental Protection Agency, Region 6
 Superfund Division (6RC-S)
 1445 Ross Avenue
 Dallas, Texas 75202-2733

Re: Special Notice and Notice of PRP Meeting, Remedial Investigation and Feasibility Study,
 Draft Administrative Order on Consent
 Star Lake Canal Superfund Site, Jefferson County, Texas

Dear Mr. Quinones:

We represent KMG Chemicals, Inc. ("KMG") and, as you may recall, we spoke on January 7, 2003 about a Special Notice Letter regarding the Star Lake Canal Superfund Site ("Star Lake Site") sent to IDACON, Inc. ("IDACON") at 10611 Harwin Dr., Suite 400, Houston, Texas 77036. During that conversation, we informed you that IDACON was no longer at the address listed on your Notice Letter. In response, you stated that EPA had used the last known address for IDACON and that there would be no need for us to take any responsive action at that time as KMG was not identified as a PRP for the Star Lake Site.

Since our last conversation, we have learned that in 1988 KMG took over the Houston office space located at 10611 Harwin Dr. that had been previously occupied by IDACON. This explains why KMG continues to receive IDACON correspondence from EPA. A public records search has revealed that in 1988 IDACON, Inc. (an Illinois corporation) merged with IDACON, Inc. (a Delaware corporation) and that IDACON, Inc. (the Delaware corporation) subsequently dissolved in 1996 and no longer exists. Further, as we understand EPA's interest in the Star Lake Site concerning IDACON, KMG never owned nor has it ever operated any portion of the production plant located in Port Arthur, Texas for which EPA believes IDACON is responsible. In providing this information, KMG does not represent, nor does it speak on behalf of IDACON or its interests in this or any other matter.

We recently received another letter from your office addressed to IDACON at 10611 Harwin Dr., Suite 400, Houston, Texas 77036. This letter, dated January 31, 2003, provides notice of a PRP meeting to be held at the U.S. Environmental Protection Agency's Region 6 office on Tuesday February 11. Again, we want to inform you that IDACON is not at this address.

Based on this information, KMG does not plan to participate in either the upcoming PRP meeting scheduled for February 6, 2003 or in the settlement of costs associated with the Star Lake Site referenced in your December 17, 2002 Special Notice Letter.

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Attorneys

1000 Louisiana Street Suite 4300 Houston, Texas 77002-5012
 Telephone [713] 547 2000 Fax [713] 547 2600 <http://www.haynesboone.com>

Please contact me if you have any questions, or wish to provide any further correspondence regarding this matter.

Sincerely,

Andrew Fono w/permission & Hill

Andrew L. Fono

Direct Phone Number: 713-547-2062

Direct Fax Number: 713-236-5601

Email: fonoa@haynesboone.com

cc: Mr. Jeff Hembree [Firm]

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www.haynesboone.com

HAYNES AND BOONE, LLP

Fax Transmittal

DATE: February 10, 2003

Total Pages Including Cover:

TO: Edwin M. Quinones

Company: US Environmental Protection

Fax #: 214-665-6460

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Client/Matter #:

FROM: Andrew Fono

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Should you have any problems with this transmittal, please call: 713-547-2704 Linda Gill

MESSAGE:

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HAYNES AND BOONE, LLP

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Attorneys

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AUSTIN DALLAS FORT WORTH HOUSTON RICHARDSON SAN ANTONIO WASHINGTON, D.C. MEXICO CITY

HAYNES AND BOONE, LLP

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Sincerely,

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cc: Mr. Jeff Hembre [Firm]

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